

**UTAH DIVISION OF SOLID AND HAZARDOUS WASTE
LANDFILL PERMIT
STATEMENT OF BASIS**

Owner: Contract Environmental Services, Inc.

Landfill Class: V – Commercial Nonhazardous Solid Waste Disposal Facility

Waste Accepted: Asbestos Containing Waste (Friable Asbestos)

Basis for Permit Class and Requirements:

Friable asbestos waste is the result of work conducted by licensed asbestos abatement contractors. The potential health effects come from asbestos fibers entering the lungs. Asbestos abatement contractors are required to contain these fibers in double bags. Air is removed from the bag and subsequently sealed. The bag is then put in another bag from which the air is also removed and again sealed. These bags are transported in trucks that are lined and covered. Upon arrival at the disposal site, the bags are placed in the landfill disposal cell and are covered. Bags cannot be broken and the landfill cannot use compaction equipment on the waste. Bags are placed in the disposal cell by hand or with a small piece of equipment and every effort is made to maintain the integrity of the bags. Asbestos disposal facilities are required to fence the asbestos disposal cell and to place signs warning that friable asbestos has been disposed at the site.

Friable asbestos is a solid waste and is classified as a special waste requiring special handling under Utah Administrative Code (UAC) R315-315. Because of the special handling requirements that are required, material containing asbestos is specifically excluded from the definition of construction and demolition (C/D) waste and therefore is not to be disposed in a C/D landfill. Once the friable asbestos is placed in a disposal cell and covered, eliminating any human exposure opportunities, the health risk is extremely low. Friable asbestos is an appropriate waste for disposal in Class I, II, III or V landfills where proper operational procedures are detailed in the permit and are to be followed by the landfill operator.

Specific Requirements for Contract Environmental Class V Asbestos Monofill

Contract Environmental Services, Inc. has proposed the construction and operation of the landfill to take only material resulting from the abatement of structures containing friable asbestos. Because Contract Environmental Services, Inc. intends to operate the facility for a profit and only receive asbestos-containing waste, the only landfill class that would apply is a Class V landfill. However, most of the siting, operation, monitoring and closure requirements that apply to a Class V landfill are not necessary for the limited type of waste to be disposed by Contract Environmental Services.

To provide the appropriate level of regulatory oversight and protection of public health and the environment while not placing unnecessary restrictions on the facility, a

combination of requirements from the rules covering Class V and Class VI landfills has been used to permit the facility.

The siting criteria that are most appropriate for the level of risk posed by the facility are those for a Class VI landfill (commercial C/D) that takes dead animals. These siting criteria provide the necessary protection for public health and the environment through setback distances from buildings and other areas occupied by people as well as floodplain and wetlands preservation.

Additionally, operational requirements regarding the disposal of friable asbestos are also addressed by rules administered by the Utah Division of Air Quality. Inspection of the waste at the landfill is to be performed without opening the bags and the subsequent disposal is to be done without compaction or breaking the sealed bags. Proper soil or an alternative cover must be applied over the waste each day. Proper signs and fencing must be in place and maintained.

Inspections of the site along with closure and post-closure care are to be conducted in accordance with the requirements for a Class VI landfill found in UAC R315-305.